

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: **DELONE LESLIE** : **CHAPTER 13**
 : **BANKRUPTCY NO. 18-16697 AMC**
DEBTOR :

**DEBTOR'S OBJECTION TO THE
CERTIFICATION OF DEFAULT BY NATIONSTAR MORTGAGE LLC**

TO THE HONORABLE ASHELY M. CHAN, U.S. BANKRUPTCY JUDGE:

Movant/Debtor, **DELONE LESLIE**, by and through his attorney, **MICHAEL SCHWARTZ, ESQUIRE**, hereby files this Objection to the Certification of Default filed by Nationstar Mortgage LLC, Respondent/Creditor, and in support thereof, avers as follows:

1. On September 25, 2020, Movant/Creditor Nationscredit, filed a Certification of Default with this Court alleging that Debtor was in arrears on their mortgage in the amount of \$3,828.36.
2. The sole reason that Movant/Creditor filed the Certification of Default is because of the alleged arrears in the mortgage payments.
3. Debtor has made payments to Movant/Creditor since the stipulation in the amounts alleged on the Notice of Default. Debtor will provide proof of that payment prior to the hearing.

WHEREFORE, Debtor respectfully requests that this Court deny Creditor's request to sign the Order submitted to the Court and declare that the automatic stay is still in effect.

Respectfully submitted,

\s\ Michael Schwartz
MICHAEL SCHWARTZ, ESQUIRE
Attorney for Debtor